

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Petition of Massachusetts Electric Company for approval	)	
of its Rate Reconciliation and Adjustment filing	)	D.T.E. 01-102
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ATTORNEY GENERAL'S FIRST SET OF  
DOCUMENT AND INFORMATION REQUESTS

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to Massachusetts Electric Company and Nantucket Electric Company or to any individual or entity sponsoring testimony or retained by the Companies to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response.
16. The terms “Company” or “Companies” refer to Massachusetts Electric Company and Nantucket Electric Company. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.

The following is the Attorney General's FIRST SET of Document and Information Requests in the above referenced docket.

AG-1-1        During the Company's reconciliation proceeding last year, D.T.E. 00-109, the Company's witness testified regarding a dispute between the Company and Massachusetts Electric Company's standard offer supplier. The dispute involved responsibility for the payment of certain uplift charges. The Company and the supplier were in the process of settling the dispute. See D.T.E. 00-109 Transcript, Vol. 1, pp. 22-27.

Please provide a status report regarding the dispute. Include all facts and arguments relied upon by the Company and the supplier supporting their positions. Include a discussion of ISO-NE's rules or position regarding the responsibility for this type of uplift charges (who is responsible and how have the rules changed during the period of the dispute).

If the matter has been settled, please provide a description of and documentation supporting the final disposition. Include the amount of the disputed charges through the date of the settlement, the amount of these charges that the Company has recovered from its customers (identify separately any associated carrying costs) and the amount of these charges that the supplier has or will pay. Also, provide the amount included in the current transmission charge and an estimate of the 2002 charges. Include all workpapers, calculations and assumptions supporting the estimate.

If the matter has yet to be settled, please provide an estimate of when the Company believes the matter will be resolved. Provide the total amount of the disputed charges that have been included in calculating the Company's retail transmission rates. Include an estimate of these charges for 2002 and all workpapers, calculations and assumptions supporting the estimate.

Please explain how other electric distribution companies and their customers are paying for these types of charges (are they included in the Company's transmission rates, standard offer rates or some other rate component—please identify that component, if known).

Did the dispute involve Narragansett Electric Company? If yes, what is the status of that dispute—include any and all Rhode Island Commission filings and orders related to this issue? If resolved, please provide the details of the resolution—include any and all rulings by the Rhode Island Commission regarding this matter. If Narragansett was not involved in the dispute, please explain what conditions were different in Rhode Island than those in Massachusetts.

Dated: April 11, 2002